



**COUNTY OF LOS ANGELES
DEPARTMENT OF AUDITOR-CONTROLLER**

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May 9, 2012

TO: Supervisor Zev Yaroslavsky, Chairman
Supervisor Gloria Molina
Supervisor Mark Ridley-Thomas
Supervisor Don Knabe
Supervisor Michael D. Antonovich

FROM: Wendy L. Watanabe
Auditor-Controller

SUBJECT: **PROBATION DEPARTMENT JUVENILE CAMPS – DEPARTMENT OF
JUSTICE SETTLEMENT AGREEMENT MONITORING FOR
DECEMBER 1, 2011 THROUGH FEBRUARY 29, 2012 – FIFTH STATUS
REPORT**

On August 17, 2010, your Board instructed the Auditor-Controller (A-C) to monitor the County Probation Department's (Probation) progress toward implementing the provisions of the federal Department of Justice (DOJ) settlement agreement. This is our fifth status report. The settlement agreement covers 18 Probation camps and six specialized units. However, five of the Probation camps were not open during the current review period. In addition, we are no longer responsible for monitoring one specialized unit. As a result, our review was limited to 13 camps and five specialized units.

We are responsible for monitoring the status of 22 of the 41 provisions from the DOJ settlement agreement. Twelve of the other nineteen provisions are being monitored by the County Department of Mental Health (DMH) because they require a mental health specialist; three provisions are administrative issues that do not require formal monitoring; and Probation indicated that we are no longer responsible for monitoring the four remaining provisions. Specifically, Probation indicated that the DOJ is relying on their own observations and the results of Probation's internal reviews to evaluate compliance with Provision 9 - Protection from Abusive Institutional Practices; Provision 13 - Threats and Intimidation; Provision 15 - Staffing; and Provision 22 - Classification. The DOJ Monitor indicated that Probation fully implemented Provision 13 effective

March 30, 2012. In addition, the DOJ Monitor approved Provisions 9 and 22 for formal monitoring effective October 31, 2011.

We evaluated Probation's progress in implementing the provisions we are responsible for using monitoring tools developed by Probation and the DOJ Monitor. The monitoring tools include specific criteria, which result in a precise score. Prior to the start of our review, Probation and the DOJ Monitor had not developed monitoring tools for two provisions and Probation had fully implemented three provisions. As a result, we only reviewed 17 of the 22 provisions we are responsible for monitoring. In addition, because of the differences in juvenile populations and services among Probation's camps and units, some of the settlement agreement provisions only apply to some of the camps/units.

When the DOJ Monitor determines that Probation has met most of a provision's requirements, the DOJ monitor will then authorize placing the provision into "formal monitoring", and will continue to track Probation's compliance. If Probation continues to meet the requirements of the provision for 12 consecutive months, the DOJ Monitor will consider Probation to have completed formal monitoring (fully implemented) for that provision. The settlement agreement requires the County to fully implement all of the provisions by October 2012.

Results of Review

Our review disclosed that Probation continues to make progress in complying with the 17 provisions we monitored. As noted in the following table, Probation completed the formal monitoring process for five of the 17 provisions during this period, meaning the DOJ considers those five provisions to be fully implemented. Our current review also indicates that Probation was in substantial compliance (compliance level of 90% or more) with nine (53%) of the 17 provisions; had a compliance level of 70% to 89% for two (12%) provisions; and a compliance level of 69% or less for only one (6%) provision.

Compliance Level	Number of Provisions				
	As of Feb 28, 2011	As of May 31, 2011	As of Aug 31, 2011	As of Nov 30, 2011	As of Feb 29, 2012
Fully Implemented	0	0	0	3	8
90% or higher	3	6	9	10	9
70% to 89%	4	7	5	5	2
69% or less	11	5	3	1	1

The table above shows the compliance levels for all the provisions we monitor. It should be noted that the compliance level for one provision (Provision 18 - Staff Training and Supervision of Youth) was lower in our current review, compared to our prior review. Probation explained that the discrepancy was because of the timing of our review. Specifically, the Department indicated that they started training Department staff on the requirements of this Provision during February 2012, and our review only covered the training records through January 2012.

Attachment 1 is the detailed results of our monitoring each provision. Attachment 2 shows the compliance level of each provision in our current review, and the compliance level from our prior reviews. Attachment 3 lists the compliance levels for each provision at each camp/unit.

Review of Report

We discussed the results of our review with Probation management, who generally agreed with the results of our review. They also indicated they will continue to work with the DOJ to implement all of the provisions of the settlement agreement. We thank Probation management and staff for their cooperation and assistance during our review.

Please call me if you have any questions, or your staff may contact Don Chadwick at (213) 253-0301.

WLW:JLS:DC:AA

Attachments

c: William T Fujioka, Chief Executive Officer
Jerry E. Powers, Chief Probation Officer
Calvin C. Remington, Chief Deputy Probation Officer
Marvin J. Southard, D.S.W., Director, Department of Mental Health
Mitchell H. Katz, M.D., Director, Department of Health Services
Arturo Delgado, Ed.D., Superintendent, Los Angeles County Office of Education
Public Information Office
Audit Committee

**LOS ANGELES COUNTY PROBATION CAMPS
JUVENILE CAMP DOJ SETTLEMENT AGREEMENT MONITORING RESULTS
FOR DECEMBER 1, 2011 THROUGH FEBRUARY 29, 2012**

Scope of Review

We are responsible for monitoring 22 of the 41 provisions from the Department of Justice (DOJ) settlement agreement. Twelve of the other 19 provisions will be monitored by the County Department of Mental Health (DMH) because the provisions require a mental health specialist; three provisions are administrative issues that do not require formal monitoring; and the County Probation Department (Probation) indicated that we are no longer responsible for monitoring the four remaining provisions. Specifically, Probation indicated that the DOJ is relying on the results of their own observations, and Probation's internal reviews to evaluate compliance with Provision 9 - Protection from Abusive Institutional Practices; Provision 13 - Threats and Intimidation; Provision 15 - Staffing; and Provision 22 - Classification. The DOJ monitor indicated Probation fully implemented Provision 13 effective March 30, 2012. In addition, the DOJ Monitor approved Provisions 9 and 22 for formal monitoring, effective October 31, 2011.

We evaluate Probation's progress in implementing each provision using monitoring tools developed by Probation and the DOJ Monitor. The monitoring tools include specific criteria, which result in a precise score. Prior to the start of our review, Probation and the DOJ Monitor had not developed the monitoring tools for two provisions, and Probation had fully implemented three provisions. As a result, we only reviewed 17 of the 22 provisions we are responsible for monitoring.

Our review covered the 13 camps and five specialized units that were open from December 1, 2011 through February 29, 2012.

Provision 10: Use of Force

The County shall develop and implement a comprehensive policy and accompanying practices governing use of force, ensuring that the least amount of force necessary for the safety of staff, youth residents, and visitors is used on youth.

This Provision applies to 13 camps and three specialized units.

Average Compliance Level: 99%

Comments:

Fifteen (94%) of the 16 camps/units achieved substantial compliance of 90% or more. The remaining camp (Camp Gonzales) achieved a compliance level of 88%. The Camp Director did not ensure that all staff had signed off on Probation's Safe Crisis

Management (SCM) policy. Specifically, 11 (20%) of the 55 active staff at the Camp had not signed-off on the policy.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 11: Oleoresin Capsicum (OC or Pepper) Spray

The County shall develop and implement policies, procedures, and practices to restrict the use of OC spray to appropriate circumstances; enable supervisors to maintain appropriate controls over spray use and storage; restrict the carrying of OC spray to individuals who need to carry and use it; prevent the use of OC spray, wherever possible, on populations for whom its use is contraindicated or contrary to doctors' instructions; and ensure that decontamination occurs properly.

This Provision is only applicable to the Challenger Memorial Youth Center (CMYC) Security Unit, which administers the pepper spray canisters at three camps and two specialized units located at CMYC.

Compliance Level: 96%

Comments:

The Security Unit was in substantial compliance with this Provision. The DOJ Monitor indicated that Probation fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. As a result, we plan to reduce our monitoring of this Provision to once a year. We will review this Provision again during our December 2012 through February 2013 quarterly review.

Provision 12: Use of Force Review

The County shall develop and implement a system for senior management to review use of force and alleged child abuse, so they can use the information to improve training and supervision of staff, guide staff discipline, and make needed policy/programmatic changes.

This Provision applies to 13 camps and four specialized units.

Average Compliance Level: 95%

Comments:

Fifteen (88%) of the 17 camps/units achieved substantial compliance of 90% or more. The remaining two camps (Kilpatrick and Paige) achieved an average compliance level of 79%. Generally, the directors at the two camps did not always ensure that supervisors completed their reviews of use of force incidents within five business days,

as required. Specifically, three (60%) of the five reviews sampled were completed an average of four days late.

The directors at the two camps also did not always ensure that supervisors conducted a Child Safety Assessment within the required two-hour timeframe. Specifically, two (25%) of the eight minors reviewed were assessed 12 hours and 30 minutes late, respectively.

In addition, the Camp Kilpatrick Director did not have written minutes for eight (72%) of the 11 monthly SCM/Youth on Youth Violence (YOYV) meetings reviewed to document the discussion and assessment of SCM and YOYV incidents that took place at the Camp.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 14: Consumption of Alcohol by Staff

The County shall ensure that staff at the Probation Camps do not maintain or consume alcohol at the Camps.

This Provision applies to ten camps and two specialized units, including the CMYC Security Unit, which covers the three camps and two specialized units at CMYC.

Average Compliance Level: 98%

Comments:

Eleven (92%) of the 12 camps/units achieved substantial compliance of 90% or more. The remaining camp (Camp Gonzales) achieved a compliance level of 82%. Specifically, the Camp Director did not conduct random searches for alcohol, drugs, and weapons.

The DOJ Monitor indicated that Probation fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. As a result, we plan to reduce our monitoring of this Provision to once a year. We will review this Provision again during our December 2012 through February 2013 quarterly review.

Provision 16: Orientation

The County shall ensure that all youth, including those who are disabled or Limited English Proficient, receive orientation sufficient to communicate important information, such as how to access the grievance system, medical care, and mental health services, or report staff misconduct.

Comments:

During our last review, the DOJ Monitor indicated that Probation fully implemented this Provision by maintaining “substantial compliance” with the Provision for 12 consecutive months. As a result, we reduced our review of this Provision to once a year. We will review this Provision again during our September through December 2012 quarterly review.

Provision 18: Staff Training and Supervision of Youth

The County shall ensure that staff who work with youth residents have the knowledge and skills needed to effectively manage youth, including de-escalation techniques, crisis intervention, youth development, and supervision.

This Provision applies to 13 camps and three specialized units.

Average Compliance Level: 57%

Comments:

One (6%) of the 16 camps/units achieved substantial compliance of 90% or more. The remaining 15 camps/units achieved an average compliance level of 55%. Probation management developed an initial 24-hour training class for staff and supervisors on effectively managing youth, including de-escalation techniques, crisis intervention, and youth development. However, Probation is required to provide an annual 16-hour refresher training class after the initial training has been completed. We noted that Probation management did not ensure that all supervisors and Probation Officers completed the annual refresher training. Specifically, 10% of the supervisors and 62% of the Probation Officers assigned to the 15 camps/units did not complete the training.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011. However, our review indicated a compliance rate of 57%. Probation explained that the discrepancy was because of the timing of our review. Specifically, the Department indicated that they started the annual refresher training classes in February 2012, and our review only covered the training records through January 2012.

Provision 19: Reduction of Youth on Youth Violence (YOYV)

The County shall develop and implement strategies for reducing youth on youth violence (YOYV) that includes training staff in appropriate behavior management, recognition and response to gang dynamics, and violence reduction techniques.

This Provision applies to 13 camps and three specialized units.

Average Compliance Level: 98%

Comments:

Fifteen (94%) of the 16 camps/units achieved substantial compliance of 90% or more. The remaining camp (Camp Kilpatrick) achieved a compliance level of 85%. Specifically, the Camp Director did not have written minutes for the monthly SCM/YOYV meetings to document the discussion and assessment of SCM and YOYV incidents that took place at the Camp.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 20: Child Abuse Reporting

The County shall develop policies, practices, and procedures to define those circumstances in which staff must report allegations of child abuse or neglect to the appropriate external agencies.

This Provision applies to 13 camps and three specialized units.

Average Compliance Level: 93%

Comments:

Thirteen (81%) of the 16 camps/units achieved substantial compliance of 90% or more. The remaining three camps/units achieved an average compliance level of 87%. Probation developed policies and procedures to define when staff must report allegations of child abuse or neglect. However, Probation management did not ensure that all staff working at the three camps/units completed the training. Specifically, 15% of Probation Officers and 18% of non-peace officer staff from Probation, Juvenile Court Health Services (JCHS), and Los Angeles County Office of Education (LACOE) assigned to the three camps did not complete the training.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 21: Child Abuse Investigation

The County shall develop and implement a system for the timely, thorough, and independent investigation of alleged child abuse. Staff that is the subject of an allegation of child abuse shall be removed from direct youth supervision pending the outcome of the referral or investigation.

This Provision only applies to the Child Abuse Special Investigations Unit (CASIU).

Compliance Level: 98%

Comments:

The CASIU was in substantial compliance with this Provision. The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 23: Grievance System

The County shall develop an effective grievance system to which youth have access when they have complaints, ensure that grievances may be filed confidentially, and ensure that they receive appropriate follow-up, including informing the author of the grievance about its outcome, and tracking implementation of resolutions. The County shall ensure that the grievance system provides youth with a safe avenue to report abuse, staff misconduct, or unfair treatment.

This Provision applies to 13 camps and two specialized units.

Average Compliance Level: 98%

Comments:

All fifteen camps/units achieved substantial compliance of 90% or more. The DOJ Monitor indicated that Probation fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. As a result, we plan to reduce our monitoring of this Provision to once a year. We will review this Provision again during our December 2012 through February 2013 quarterly review.

Provision 24: Youth Movement Between the Probation Camps or Between the Probation Camps and the County Juvenile Halls

The County shall ensure that movement of youth residents between facilities does not interfere with ongoing testing or provision of medical, mental health, or educational services at the camps, unless court proceedings, treatment, or security needs require such movement.

Comments:

During our last review, the DOJ Monitor indicated that Probation fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. As a result, we reduced our review of this Provision to once a year. We will review this Provision again during our September through December 2012 quarterly review.

Provision 25: Development and Implementation of Suicide Prevention Policy

The County shall develop and implement adequate policies, procedures, and practices relating to suicide prevention.

Comments:

During our last review, the DOJ Monitor indicated that Probation fully implemented this Provision by maintaining “substantial compliance” with the Provision for 12 consecutive months. As a result, we reduced our review of this Provision to once a year. We will review this Provision again during our September through December 2012 quarterly review.

Provision 27: Management of Suicidal Youth

The County shall develop and implement policies, procedures, and practices to ensure that mental health staff is sufficiently involved with Probation and education staff in the management of youth exhibiting suicidal behaviors, including creation of individual behavior modification programs, and decisions and appropriate clothing, bedding, and housing.

This Provision applies to the six camps/units that had minors on Level 2 or Level 3 Enhanced Supervision at the time of our review. Level 2 Supervision is required for minors who are not actively suicidal, but may experience persistent suicidal ideations. Level 3 Supervision is required for minors who are at high risk of suicide.

Average Compliance Level: 98%

Comments:

All six camps/units achieved substantial compliance of 90% or more. The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 29: Documentation of Suicide Precautions

The County shall develop and implement policies, procedures, and practices to ensure that the following information is thoroughly and correctly documented, and provide information to all staff who need to know such information: a) the times youth are placed on and removed from precautions; b) the levels of precautions on which youth are maintained; c) the housing locations of youth on precautions; d) the conditions of the precautions; and the times and circumstances of all observations by staff monitoring the youth.

This Provision applies to 13 camps and two specialized units. Specifically, Provision 29 is comprised of three separate monitoring tools covering mental health needs (29A), and suicidal minors requiring an increased level of supervision (29B and 29C). The overall compliance percentage for this Provision is calculated by averaging the scores for the three tools at each of the applicable camps/units. Because of the differences in juvenile populations and services provided among Probation’s camps and units, Tools 29B and 29C only apply to some of the camps/units.

Average Compliance Level: 89%

Comments:

29A – Mental Health Needs

Ten (67%) of the 15 camps/units achieved substantial compliance of 90% or more. The remaining five camps achieved an average compliance level of 76%. Specifically, staff at the five camps did not always initial the required documents acknowledging that they reviewed DMH's mental health assessments describing the minors' mental health needs.

29B – Enhanced Supervision Level 3

This Provision applies to the five camps/units that had minors on Level 3 Supervision at the time of our review.

Three (60%) of the five camps/units achieved substantial compliance of 90% or more. The remaining two camps (Miller and Munz) achieved an average compliance level of 84%. The managers at the two camps did not always ensure that Enhanced Supervision Observation Forms were completed entirely for minors requiring Level 3 Supervision.

29C – Enhanced Supervision Level 2

This Provision applies to the four camps/units that had minors on Level 2 Supervision at the time of our review.

All four camps/units achieved substantial compliance of 90% or more.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 30: Supervision of Youth at Risk of Self-Harm

The County shall sufficiently supervise youth newly assigned to a Camp, youth in seclusion, and other youth at heightened risk of self-harm to maintain their safety.

This Provision applies to the four camps and two specialized units that had minors on Level 1 Enhanced Supervision (Level 1 Supervision) at the time of our review. Level 1 Supervision is required for all minors who are not at risk of suicide or self-injury.

Average Compliance Level: 98%

Comments:

All six camps/units achieved substantial compliance of 90% or more. The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 31: Suicide Precautions for Youth Awaiting Transfer to Another Facility

The County shall develop and implement policies, practices, and procedures to ensure that adequate suicide precautions are provided to youth who are awaiting transfer to another facility for assessment (mental health assessment).

This Provision applies to the two camps and one specialized unit that had minors on Level 4 Enhanced Supervision (Level 4 Supervision) at the time of our review. Level 4 Supervision is required for minors who are actively suicidal, or have engaged in serious self-harming behavior, and have been transferred from the camps/units to a higher level of care (e.g., psychiatric emergency care facility) for psychiatric assessment.

Average Compliance Level: 93%

Comments:

Two (67%) of the three camps/units achieved substantial compliance of 90% or more. The remaining specialized unit (Dorothy Kirby Center) achieved a compliance level of 80%. Specifically, the manager did not completely document the authorization to remove one (100%) minor from the facility. In addition, the manager did not ensure that a Special Incident Report (SIR) was completed entirely for the one minor who was on Level 4 Supervision and was transferred out of the facility.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 32: Training (Suicide Prevention)

The County shall ensure that all Camp staff who work with youth are sufficiently trained in suicide prevention so that they understand how to prevent and respond to crises, including practical matters, such as the location and use of a cut-down tool if a youth attempts to hang him/her self.

This Provision applies to 13 camps and three specialized units.

Average Compliance Level: 89%

Comments:

Seven (44%) of the 16 camps/units achieved substantial compliance of 90% or more. The remaining nine camps/units achieved an average compliance level of 85%. Probation management developed a training class on suicide prevention. However,

Probation management did not ensure that all staff at the nine camps/units received the training. Specifically, 12% of Probation Officers and 21% of non-peace officer staff from DMH, LACOE, and JCHS assigned to the nine camps/units did not complete the training.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 34: Screening

The County shall develop and implement policies, procedures, and practices for initial mental health screening to allow the identification of previously diagnosed and potentially existing mental health or substance abuse disorders, including potential suicidality. Such screening shall take place within 48 hours prior to a youth's arrival at a Camp, or within 24 hours after a youth's arrival at a camp.

This Provision applies to 13 camps and two specialized units.

Compliance Level: 100%

Comments:

All fifteen camps/units achieved substantial compliance of 100%. The DOJ Monitor indicated that Probation fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. As a result, we plan to reduce our monitoring of this Provision to once a year. We will review this Provision again during our December 2012 through February 2013 quarterly review.

Provision 45: Staff Understanding of Mental Health and Developmental Disability Needs

The County shall ensure that all staff working with youth residents have the skills and information necessary to understand behaviors of, engage in appropriate interactions with, and respond to needs of, youth with mental illness and developmental disabilities.

This Provision applies to 13 camps and three specialized units.

Average Compliance Level: 90%

Comments:

Eight (50%) of the 16 camps/units achieved substantial compliance of 90% or more. The remaining eight camps/units achieved an average compliance level of 86%. Probation management developed a training class to understand behaviors of, engage in appropriate interaction with, and respond to needs of youth with mental illness and developmental disabilities. However, Probation management did not ensure that all

staff at the eight camps/units completed the training. Specifically, 14% of Probation Officers and 13% of non-peace officer staff from Probation, LACOE, and JCHS assigned to the eight camps/units did not complete the training.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 46: Discharge Summaries

The County shall provide aftercare planning and discharge summaries for youth leaving the facility who have, or have had, open mental health cases at a camp to facilitate treatment in future placements.

This Provision applies to 13 camps and one specialized unit.

Average Compliance Level: 99%

Comments:

Thirteen (93%) of the 14 camps/unit achieved substantial compliance of 90% or more. The remaining camp (Camp Kilpatrick) achieved a compliance level of 88%. Specifically, the Camp Director did not always ensure that discharge summaries were completed entirely for each minor discharged from the Camp.

The DOJ Monitor indicated that Probation fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. As a result, we plan to reduce our monitoring of this Provision to once a year. We will review this Provision again during our December 2012 through February 2013 quarterly review.

**DOJ Settlement Agreement Provision
Monitored by the Auditor-Controller
Compliance Level Summary
For Monitoring Reviews Completed Through February 29, 2012**

Provision	Description	Monitoring Results (1)				
		Feb 28, 2011	May 31, 2011	Aug 31, 2011	Nov 30, 2011	Feb 29, 2012
9 (3)	Protection from Abusive Practices	N/A	N/A	N/A	N/A	N/A
10	Use of Force	22%	95%	96%	96%	99%
11 (4)	Chemical Restraint	50%	95%	93%	90%	96%
12	Use of Force Review	50%	88%	89%	94%	95%
13 (3)	Threat and Intimidation	N/A	N/A	N/A	N/A	N/A
14 (4)	Consumption of Alcohol by Staff	85%	85%	82%	93%	98%
15 (3)	Staffing	N/A	N/A	N/A	N/A	N/A
16 (4)	Orientation	95%	97%	99%	99%	N/A
17 (2)	Rehabilitation & Behavior Management	N/A	N/A	N/A	N/A	N/A
18	Staff Training and Supervision of Youth	19%	61%	89%	90%	57%
19	Youth-on-Youth Violence (YOYV)	83%	92%	92%	96%	98%
20	Child Abuse Reporting	34%	51%	88%	89%	93%
21	Child Abuse Investigation	40%	48%	62%	84%	98%
22 (3)	Classification	33%	76%	N/A	N/A	N/A
23 (4)	Grievance System	91%	92%	98%	97%	98%
24 (4)	Youth Movement Between Probation Camps and/or Halls	42%	80%	98%	96%	N/A
25 (4)	Development and Implementation of Policy (Suicide Prevention)	88%	96%	96%	98%	N/A
27	Management of Suicidal Youth	N/A	N/A	N/A	N/A	98%
29	Documentation of Suicide Precautions	69%	85%	66%	82%	89%
30	Supervision of Youth at Risk of Self Harm	N/A	N/A	N/A	94%	98%
31	Suicide Precautions for Youth Awaiting Transfer to Another Facility	N/A	N/A	N/A	82%	93%
32	Training (Suicide Prevention)	38%	57%	86%	88%	89%
34 (4)	Screening	91%	89%	97%	99%	100%
43 (2)	Substance Abuse	N/A	N/A	N/A	N/A	N/A
45	Staff Understanding of Mental Health and Developmental Disability Needs	37%	42%	8%	7%	90%
46 (4)	Discharge Summaries	53%	87%	97%	97%	99%
Average Overall		58%	78%	85%	88%	93%

Footnote Legend

- (1) Provisions that are in substantial compliance (achieved a 90% or better compliance level) are highlighted in green. Provisions with compliance levels that dropped from the previous review are highlighted in red.
- (2) Probation and the DOJ Monitor had not finalized the monitoring tools needed to measure compliance with the Provision. As a result, the Provision was not included in our review.
- (3) Probation indicated that we are no longer responsible for monitoring this provision. Specifically, Probation indicated that the DOJ is relying on their own observations and the results of Probation's audits to evaluate compliance.
- (4) The DOJ Monitor indicated that Probation fully met the requirements of this provision by maintaining "substantial compliance" with this provision for 12 consecutive months. As a result, we plan to reduce the frequency that we monitor this provision to once a year.

**DOJ Settlement Agreement Provision
Monitoring Results
For The Monitoring Period December 2011 Through February 2012**

Date			Compliance Percentage for A-C Monitored Provisions (1)																	
Camp/Unit	Review Date	Period Reviewed	10	11	12	14	18	19	20	21	23	27	29	30	31	32	34	45	46	Average
Camp Gonzales	12/7/2011	June-Sept 2011	88%	N/A	93%	82%	82%	98%	98%	N/A	90%	100%	81%	95%	100%	96%	100%	94%	100%	93%
Camp Miller	12/12/2011	Aug-Sept 2011	100%	N/A	96%	97%	71%	100%	99%	N/A	94%	94%	82%	N/A	N/A	99%	100%	97%	93%	94%
Camp Kilpatrick	12/14/2011	Aug-Sept 2011	99%	N/A	72%	98%	74%	85%	99%	N/A	95%	N/A	93%	100%	N/A	99%	100%	92%	88%	92%
Camp Scott	12/20/2011	Aug-Sept 2011	100%	N/A	95%	99%	66%	96%	95%	N/A	100%	N/A	90%	100%	N/A	88%	100%	89%	100%	94%
Camp Scudder	12/21/2011	Aug-Sept 2011	100%	N/A	93%	99%	37%	100%	92%	N/A	100%	N/A	100%	N/A	N/A	83%	100%	94%	100%	92%
Camp Munz	1/10/2012	July-Sept 2011	100%	N/A	98%	99%	40%	100%	95%	N/A	99%	98%	78%	N/A	N/A	94%	100%	87%	100%	91%
Camp Mendenhall	1/12/2012	July-Sept 2011	98%	N/A	100%	100%	47%	100%	94%	N/A	97%	N/A	93%	N/A	N/A	83%	100%	95%	100%	92%
Camp Paige	1/17/2012	Aug-Sept 2011	100%	N/A	85%	99%	39%	96%	87%	N/A	100%	N/A	80%	N/A	N/A	80%	100%	81%	100%	87%
Camp Afflerbaugh	1/19/2012	Aug-Sept 2011	100%	N/A	93%	100%	40%	100%	88%	N/A	100%	N/A	90%	N/A	N/A	86%	100%	80%	100%	90%
Camp Rocky	1/24/2012	Aug-Sept 2011	100%	N/A	100%	100%	71%	100%	93%	N/A	99%	100%	95%	98%	100%	92%	100%	87%	100%	96%
Dorothy Kirby Center	1/26/2012	Aug-Sept 2011	100%	N/A	100%	100%	48%	100%	92%	N/A	100%	100%	97%	100%	80%	88%	100%	89%	100%	93%
Special Housing Unit @ CMYC	2/6/2012	Aug-Sept 2011	100%	N/A	100%	N/A	47%	100%	90%	N/A	99%	95%	95%	97%	N/A	88%	100%	88%	N/A	92%
Security Unit @ CMYC	2/6/2012	Sept-Oct 2011	100%	96%	100%	100%	70%	100%	92%	N/A	N/A	N/A	N/A	N/A	N/A	85%	N/A	90%	N/A	93%
Camp McNair	2/8/2012	Sept-Oct 2011	100%	N/A	100%	N/A	43%	100%	96%	N/A	100%	N/A	80%	N/A	N/A	98%	100%	98%	100%	92%
Camp Onizuka	2/14/2012	Sept-Nov 2011	100%	N/A	100%	N/A	90%	98%	95%	N/A	100%	N/A	90%	N/A	N/A	82%	100%	96%	100%	96%
Camp Jarvis	2/16/2012	Sept-Nov 2011	100%	N/A	100%	N/A	52%	100%	87%	N/A	93%	N/A	90%	N/A	N/A	90%	100%	88%	100%	91%
DOJ Compliance Bureau	2/22/2012	Nov-2011	N/A	N/A	90%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	90%
CASIU	2/28/2012	Nov 2011 - Jan 2012	N/A	N/A	N/A	N/A	N/A	N/A	N/A	98%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	98%
Average Compliance Percentage			99%	96%	95%	98%	57%	98%	93%	98%	98%	98%	89%	98%	93%	89%	100%	90%	99%	93%

Footnote Legend

N/A Provision is not applicable to this camp/unit.

(1) See Attachment 2 for the title of each provision.